

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**  
**Bid Protest**

WORKHORSE GROUP INC.,	)	
	)	
Plaintiff,	)	Case No. _____
	)	
v.	)	Judge _____
	)	
THE UNITED STATES,	)	
	)	
Defendant.	)	
	)	

**PLAINTIFF’S MOTION FOR A PROTECTIVE ORDER**

Pursuant to Appendix C, Paragraph 16 of the Rules of this Court, Plaintiff Workhorse Group Inc. (“Workhorse”), hereby respectfully requests that the Court issue a standard Protective Order in this matter consistent with U.S. Court of Federal Claims Form 8 (Protective Order in Procurement Protest Cases) to safeguard the proprietary and confidential information of the parties to this litigation that is likely to be disclosed orally and/or in writing during the course of this matter. Workhorse is likely to suffer serious competitive harm if certain proprietary and/or confidential information is not safeguarded. Additionally, some of the information is subject to a Non-Disclosure Agreement that the United States Postal Service required Workhorse agree to in connection with the solicitation at issue, Solicitation No. 3D-20-A-0031.

For the foregoing reasons, Workhorse respectfully requests that the Court grant its Motion for a Protective Order.

Dated: June 16, 2021

Respectfully submitted,

/s/ Thomas P. McLish

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